

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-CR-20114-KMW

UNITED STATES OF AMERICA

vs.

CARLOS RAMON POLIT FAGGIONI

/

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE REPLIES IN SUPPORT OF PRETRIAL MOTIONS**

Defendant Carlos Polit filed three pretrial motions—a motion to suppress emails and information obtained pursuant to a search warrant served on Polit's personal email account (ECF#65), and two motions to dismiss (ECF#63, 64). Replies in support of those motions are currently due on Friday, January 27, 2023. ECF#78.

Mr. Polit seeks a two-week extension of time to file his replies, until February 10, 2023, for the following reasons:

1. Since the filing of the motion to suppress, the parties have conferred in an effort to narrow and perhaps resolve the issues raised in that motion, as well as issues that arose after the motion to suppress was filed (as described in footnote 1 of the

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government's sealed response, EFC#76). Undersigned counsel have also conferred with the filter prosecutor now assigned to this case in an effort to work out privilege issues without litigation. The parties need additional time to complete this process (including to complete a privilege log), which may result in resolution of the motion to suppress.

2. Undersigned counsel Fernando Tamayo has been Mr. Polit's long-time attorney and has been intimately involved with the issues relating to the pretrial motions and now with the privilege log. Mr. Tamayo's father was admitted to UM/Jackson and is in critical condition following a double heart bypass and a liver transplant on Monday (1-23-23). Mr. Tamayo has been by his father's side and expects to remain with his father this week, as his father undergoes additional procedures.

For these reasons, Mr. Polit respectfully requests until February 10, 2023 to file replies in support of his pretrial motions.

The government does not object.

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Respectfully Submitted,

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